

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ADAMS OUTDOOR ADVERTISING L.P., a  
Minnesota Limited Partnership,

Plaintiff,

vs.

RPM REALTY COMPANY, a Pennsylvania  
General Partnership, et al.,

Defendants.

No. 3:19-cv-00366-MEM

**JOINT STIPULATION TO EXTEND DISCOVERY AND DEADLINES BY 60 DAYS**

Whereas the undersigned counsel, on behalf of Plaintiff and Defendants, recognize that substantial barriers have existed to the completion of discovery by the current discovery deadline of June 30, 2020 (doc.46), including mandatory state-wide closures of their respective law offices due to the public health emergency (until May 29, 2020 for defense counsel (Monroe Co.) and June 5, 2020 for Plaintiff's counsel (Northampton Co.)), the unavailability of their respective staffs for in-person work under then existing state emergency orders, travel impediments for an out-of-state fact witness that the defense desires to depose, and the significant health risks and logistical issues surrounding the conduct of depositions, and whereas the parties jointly agree and hereby stipulate to an extension of discovery of sixty additional (60) days in light of these substantial impediments to the completion of discovery and the recent reopening of their physical offices, the parties respectfully request this Honorable Court extend and reset the following deadlines to the following dates:

1. All fact discovery shall be completed by **Monday, August 31, 2020**;
2. All dispositive motions shall be completed by **October 1, 2020**.

Respectfully submitted,

/s/ Travis J. Savoia

Travis J. Savoia, Esq.

/s/ Charles Bruno

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Attorneys for Plaintiff

Respectfully submitted,

/s/Gerard J. Geiger

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Attorney for Defendants

IT IS SO ORDERED this 29th day of June, 2020.

BY THE COURT:

/s/ Malachy E. Mannion

Malachy E. Mannion

United States District Judge